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ATTORNEYS FOR PLAINTIFFS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

THRESSA WALKER, GEETA SINGH,
M.D., AND KAI IHNKEN, M.D.,

Plaintiffs,

v.

COUNTY OF SANTA CLARA, SANTA
CLARA VALLEY MEDICAL CENTER,
HOLLISTER BREWSTER, M.D.,
ALFONSO BANUELOS, M.D., DOLLY
GOEL, M.D., AND DOES 1 through 50,
inclusive,

Defendants.

No. 10-CV-04668 RS

**STIPULATION TO FILE FOURTH
AMENDED COMPLAINT AND
~~PROPOSED ORDER~~
AS MODIFIED BY THE COURT**

IT IS HEREBY STIPULATED AND AGREED by the parties, through their respective attorneys of record, that the Court may grant Plaintiffs leave to file a Fourth Amended Complaint to incorporate new allegations respecting events that took place after Plaintiffs filed their Third Amended Complaint.

Plaintiffs contend that good cause exists for this further amended pleading incorporating new allegations that arise out of a common nucleus of operative facts as in Plaintiffs' original and amended complaints. A copy of Plaintiff's proposed Fourth Amended Complaint is attached as Stipulation to File Fourth Amended Complaint

10-CV-04668 RS

1 Exhibit A, and the new allegations are italicized and set forth in Paragraphs 120.1 through 120.55,
2 and 285 through 290.

3 It is further stipulated that Defendants shall have 30 days from the filing of the Fourth
4 Amended Complaint to respond to that Fourth Amended Complaint, and such response(s) need
5 only address those new allegations as identified in the above-referenced numbered paragraphs.
6

7 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
8 "conformed" signature (/S/) within this efiled document.
9

10 LAW OFFICES OF
11 BONNER & BONNER

12 Dated: November 7, 2011

13 By: /S/
14 A.CABRAL BONNER

15 Attorney for Plaintiffs
16

17 MIGUEL MÁRQUEZ
18 County Counsel

19 Dated: November 8, 2011


20 By: /S/
21 GREGORY J. SEBASTINELLI
22 Deputy County Counsel

23 Attorneys for Defendants
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25
26
27
28

~~[PROPOSED]~~ ORDER

IT IS HEREBY ORDERED that Plaintiffs may file a Fourth Amended Complaint in the form attached hereto as Exhibit A. Defendants shall have 30 days from the filing of the Fourth Amended Complaint to respond to it, and such response(s) need only address those new allegations as identified in Paragraphs 120.1 to 120.55 and 285 to 290.

Dated: 11/21/11


HONORABLE RICHARD SEEBORG
United States District Court Judge